

23-MJ-8031-PGL

**AFFIDAVIT OF MICHAEL J. HAINES**  
**IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Michael J. Haines, do hereby depose and state as follows:

1. I am a State Trooper with the Massachusetts State Police and have been so employed for 12 years. I am currently assigned to the Division of Investigative Services, Special Investigations Unit of the Massachusetts State Police and to the Federal Bureau of Investigation ("FBI") Violent Crimes Task Force ("Task Force"). The Task Force is comprised of personnel from the FBI, Massachusetts State Police, Boston, Somerville, Malden, Braintree, and Dedham Police Departments. The Task Force investigates bank robberies, as well as violent crimes, which are punishable under federal and state law.

2. During my tenure as a law enforcement officer, with both the Massachusetts State Police and the Task Force, I have interrogated numerous defendants, informants, and suspects who were users, sellers and/or distributors of controlled substances and who also had violent criminal records. I have additionally been involved in numerous investigations involving assaults, larcenies, extortion, arson, firearms violations, armed and unarmed robberies, and crimes against persons. Since joining the Task Force, I have investigated or assisted with multiple bank robbery investigations. I have been the affiant in multiple search warrants, both State and Federal.

3. I am aware that Title 18, United States Code, Section 2113(a) makes it a crime for anyone by force and violence, or by intimidation, to take, or attempt to take, from the person or presence of another, any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of any federally insured bank.

4. I make this affidavit in support of a criminal complaint charging Jerome Lamont Turner (“Turner”) DOB xx/xx/1975 with the robbery of a branch of the Brookline Bank (“the Bank”) located at 2 Harvard Street, Brookline, Massachusetts, on September 26, 2022. On the date of the robbery, the Brookline Bank was insured by the Federal Deposit Insurance Corporation. The facts stated herein are known to me through the investigation and through observations made by others with whom I have spoken. This affidavit does not contain all the facts known to me but rather only those which are sufficient to establish probable cause that Turner committed the above-mentioned bank robbery.

#### **OVERVIEW OF THE INVESTIGATION**

5. On September 26, 2022, at 8:49 am an individual entered a branch of the Brookline Bank located at 2 Harvard Street in Brookline, Massachusetts. The individual approached a teller (“the Teller”) and inquired about opening an account and was asked to sit in a waiting area until a customer service representative was available.

6. A few minutes later, the Teller spoke with the individual and he, the individual, received instructions on opening an account. The Teller provided the individual with a Bank pamphlet explaining the procedures and the individual then left the Bank. The Teller described the individual as a bald black male, approximately 30 years old, 5’8” in height wearing a surgical mask, a black and red jacket, and that he was carrying a black backpack.

7. At approximately 9:26 am, the same individual returned to the Bank and approached the Teller with whom he had previously dealt. At this time the individual handed the Teller the pamphlet that the Teller had previously provided. Written on the pamphlet were the words, “Let me have 17,000 in Large bills no dye pack.” After handing the Teller the pamphlet the individual (“the robber”) kept on motioning for the Teller to give him more money. The

Teller told the robber, words to the effect that she had no more money and the robber responded, words to the effect, “just give me whatever.”

8. The Teller took money from her drawer which the robber took, placed into his backpack and he, the robber, left the Bank, leaving the pamphlet behind.

9. Law enforcement officers arrived at the Bank and took witness statements from the Teller and other Bank employees and secured the pamphlet. The Teller stated that the individual who had robbed her was the same individual who had come to the Bank earlier and inquired about opening a new account and was given a pamphlet.

10. Bank surveillance cameras were operating and functioning on the date of the robbery and captured images of the robber as he initially entered the Bank, interacted with the Teller about opening a new account, left the Bank, and then a few minutes later returned to the Bank and interacted with the Teller. The descriptions provided by the Teller and that of the other Bank employees were consistent with the images captured on the Bank’s video surveillance cameras.

11. A post-robbery audit was conducted by the Bank, and it was determined that the robber had been given \$3,125 in US currency during the robbery.

#### **THE IDENTIFICATION OF JEROME LAMONT TURNER**

12. The pamphlet that was seized by law enforcement was returned to the Brookline Police Station and a latent print was located. This print was submitted to AFIS and later determined to belong to Turner.

13. Photographs taken from the Bank’s video surveillance cameras were circulated to members of the Brookline Police Department and two officers independently identified Turner from a previous arrest on September 20, 2022.

14. Following the robbery, law enforcement canvassed local business in and around the Harvard Street address of the Bank and located a video surveillance camera that had captured images of an individual believed to be the robber on Harvard Street a few minutes prior to the robbery. The individual captured on this video was wearing clothing consistent with the clothing the robber was wearing during the aforementioned robbery.

15. Based on the above, a criminal complaint and arrest warrant was issued by the Brookline District Court charging Turner with the September 26, 2022, robbery of the Brookline Bank.

16. On September 27, 2022, at approximately 6:10 pm a Brookline Detective observed an individual believed to be Turner standing on Harvard Avenue in Brookline. The individual was wearing the same clothing and carrying the same backpack that the robber had been wearing during the September 26, 2022, robbery of the Brookline Bank. Other Brookline officers arrived, and the individual was asked his name and his date of birth. The individual stated that his name was Jerome Lamont Turner and provided his date of birth. Turner was informed that there was an arrest warrant for the recent bank robbery and the officers attempted to place Turner under arrest. Turner was taken into custody after a violent struggle, during which he assaulted numerous officers. Turner was then transported to the Brookline Police Station for processing. During processing Turner denied that his name was Turner and stated that his name was C.P. with a DOB of xx/xx/81.

17. Turner was advised of his rights and did not make a statement.

18. During an inventory of Turner's property law enforcement recovered, amongst other things: \$275 in US currency from Turner's right front pants pocket; a Brookline District Court receipt in the name of Jerome Turner; square rimmed glasses; a black backpack containing

\$2260 in US currency; and a red and blue sweatshirt. All these items were consistent in appearance with items worn by the robber during the September 26, 2022, robbery of the Brookline Bank.

**CONCLUSION**

19. Based on the foregoing, I submit there is probable cause to believe that on September 26, 2022, Jerome Lamont Turner, by force and violence, and by intimidation took from the person and presence of another, money in the care, custody, control, management and possession of the Brookline Bank, a bank insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. § 2113(a).

/s/ Michael J. Haines  
TROOPER MICHAEL J. HAINES  
TASK FORCE OFFICER, FBI  
Sworn telephonically pursuant  
To Fed.R.Crim.P.41(d)(3)

SUBSCRIBED and SWORN to telephonically in accordance with Federal Rule of Criminal Procedure 4.1 on this 25th day of January 2023.

  
PAUL G. LEVENSON  
UNITED STATES MAGISTRATE JUDGE

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